



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

5588

AUG 12 2004

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

REPLY TO THE ATTENTION OF

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2004 AUG 12 A 8:55

LOG E-1028

FERNALD

RE: Paddys Run East
Restoration Design Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) draft Paddys Run East natural resource restoration design plan. This document details the design and specifications for conducting restoration activities within the Paddys Run East project area.

U.S. EPA has enclosed comments on the restoration plan. Therefore, U.S. EPA disapproves the Paddys Run East restoration design plan. U.S. DOE must submit a revised plan within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jamie Jameson, Fluor Fernald
Tim Poff, Fluor Fernald

TECHNICAL REVIEW COMMENTS ON
"PADDYS RUN EAST NATURAL
RESOURCE RESTORATION DESIGN PLAN"

FERNALD CLOSURE PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Original General Comment #: 1

Comment: The natural resource restoration design plan (NRRDP) frequently refers to Tables 3-1 through 3-4 as listing the species and quantities to be planted in each patch. The text should be clarified to state that Tables 3-1 through 3-4 list the species and quantities to be planted in each area and that Appendix A specifies the species and quantities to be planted in each patch.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 1.0 Page #: 1-1 Lines #: 9 through 11
Original Specific Comment #: 1

Comment: The text states that Paddys Run, the Pilot Plant Drainage Ditch, the South Pine Plantation, and the Storm Sewer Outfall Ditch are shown in Figure 1-1, but the figure does not show these features. Figure 1-1 should be revised to show these features.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Figure 1-1 Page #: Not Applicable (NA) Line #: NA
Original Specific Comment #: 2

Comment: The boundaries of the restoration area shown in the inset to Figure 1-1 do not match the boundaries shown in the figure. Also, the area south of Subarea 3 is shaded in the inset but is not included in the figure. The figure and the inset should be consistent with each other.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Figure 2-2 Page #: NA Line #: NA
Original Specific Comment #: 3

Comment: Figure 2-2 should be revised to show A2PIII so that the boundaries of the restoration plan are clear. The path of the Storm Sewer Outfall Ditch is difficult to distinguish in some areas and should also be more clearly marked on the figure.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.1 Page #: 3-1 Line #: 24
Original Specific Comment #: 4
Comment: The text should be revised to specify the proposed
number and locations of wildlife amenities.

Commenting Organization: U.S. EPA
Section #: 3.2
Original Specific Comment #: 5
Comment: The text states that a restored tallgrass prairie is located in the South Pine Plantation and that "the remainder of the area will be seeded following certification of the Subcontractor Area." It is unclear which portion of the area will be seeded as part of this NRRDP and which portion will be seeded at a later date. The text should be revised to clarify this issue, and Figure 3-2 should be revised to show the area to be seeded as part of this NRRDP. Also, the text should specify whether the mesic, wet, forest, or interim species listed in Table 3-3 will be used in this area, when the interim mix will be used, and when the "woodland mix" will be used. Finally, the phrase "woodland mix" should be changed to "forest mix" in the text to correspond to Table 3-3.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.2 Page #: 3-2 Line #: 23
Original Specific Comment #: 6
Comment: The text should specify the proposed number and
locations of wildlife amenities and vernal pools. It is
understood that these features will be subject to field
verification as stated in paragraph 2.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Figure 3-3 Page #: 3-2 Line #: NA
Original Specific Comment #: 7
Comment: Figure 3-3 should be revised to show the proposed
relocations of the bluebird boxes discussed in Section 3.3,
Page 3-2.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Table 3-2 Page #: NA Line #: NA
Original Specific Comment #: 8
Comment: Table 3-2 lists black walnut twice and lists different quantities of this type of tree on each line. The table should list the black walnut once and its correct quantity.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Table 3-3 Page #: NA Line #: NA
Original Specific Comment #: 9
Comment: This tables's list of graminoids to be seeded in the forest areas ("Forest" column) should be expanded. Species

such as woodland sedges and more shade-tolerant grass species (for example, *Hystrix patula*) should be added.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: Figures 3-1 through 3-3 Page #: NA Line #: NA
 Original Specific Comment #: 10
 Comment: Section 4.1.1 states that Figures 3-1 through 3-3 show "the location of construction area boundaries, access points, and staging areas." The figures should be revised to show the locations of these features and to label the South Field Access Road, which the text also refers to.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 4.1.2.1 Page #: 4-2 Lines #: 18 and 19
 Original Specific Comment #: 11
 Comment: The text states that "if clearing occurs when plants are dormant, glyphosate herbicide will be applied to foliage following reprot." Glyphosate should be applied to cut stumps even when plants are dormant.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 4.1.2.3 Page #: 4-3 Line #: 6-7
 Original Specific Comment #: 12
 Comment: The text should specify whether herbicide will be broadcast-sprayed or selectively applied. If herbicide will be selectively applied, mowing should not be performed before application.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 4.4.3 Page #: 4-6 Line #: 16
 Original Specific Comment #: 13
 Comment: The text should indicate the frequency with which seeded areas will be mowed to control invasive species.